

LIMITED SOURCES JUSTIFICATION/FEDERAL SUPPLY SCHEDULES

In accordance with Federal Acquisition Regulation (FAR) subpart 8.405-6 (c) (2)

1. Identification of the Agency and the contracting activity, and specific identification of the document as a "Limited Source Justification:"

This is a limited source justification for NASA Goddard Space Flight Center's (NASA GSFC's) Wallops Flight Facility (WFF). WFF proposes to increase the ceiling value on the existing Blanket Purchase Agreement (BPA) NNG09WA22Z with Airtec Incorporated. This document justifies the determination for restricting consideration of schedule contractors to fewer than required in Federal Acquisition Regulation (FAR) 8.405-2.

2. Describe the nature and/or description of the actions being approved.

NASA proposes to increase the ceiling on BPA NNG09WA22Z from \$9 by \$18M to \$27M to continue services through February 20, 2014. The performance period on the BPA is February 21, 2009 through February 20, 2014.

The BPA is under the General Services Administration (GSA) Federal Supply Schedule (FSS). The BPA provides both scheduled and unscheduled maintenance for the P3 and B-200 (NASA 8) aircraft that are located at WFF. Federal Aviation Administration (FAA) regulations part 91 requires that these aircraft are maintained in accordance with the Wallops Aircraft Office General Maintenance Manual.

This BPA also covers support services related to aircraft maintenance and mission support including engineering support and analysis, acquisition of parts and materials, and required services for tenant and visiting aircraft. These additional support services are vital to NASA's mission as they directly affect the health and safety of passengers and crew members of the aircraft.

The Independent Government Estimate (IGE) completed by the Aircraft Office supported that the original \$9 million dollars initially requested would be sufficient for the performance period and services provided under this BPA. However, an increase in the mission schedule led to additional costs and services which were not initially accounted for. Examples of the additional costs/services are listed below:

- The actual flight hours have increased over what was originally anticipated. The frequency in flight hours required heavy maintenance in accordance with the United States (U.S.) Navy maintenance guidelines for P-3 aircraft earlier than anticipated.
- The increase of the mission schedule required the contractor to hire additional pilots, aircraft technicians and maintenance staff to accommodate the rigorous workload. The frequency of the flights posed additional overtime and travel expenses not included in the original IGE.

- An unanticipated Phased Depot Maintenance for the P-3B Orion aircraft in accordance with U.S. Navy maintenance guidelines had to be completed.
- Additional Special Structural Inspections for all P-3 Orion aircraft in accordance with U.S. Navy maintenance guidelines had to be completed, resulting in the need for several unanticipated repairs.
- Specific missions, such as Operation Ice Bridge, were increased from a 5 to 10 week deployment schedule, which presented additional staffing and flight costs as well.

3. Describe the supplies or services required to meet the agency's needs. Include the estimated value.

The P3-B and NASA 8 provide flight support for the mission needs of NASA GSFC's WFF as described above. Consequently, these aircraft require servicing and maintenance actions to remain in an approved airworthiness status as mandated by the FAA.

To continue the services needed, an IGE of an additional \$18 million dollars is required to cover the period of performance through February 20, 2014. A cost breakdown of this estimate is listed below with a highlight of significant costs per year for certain maintenance.

The cost breakdown of the estimated value includes specialized maintenance and/or customizations and is as follows by year:

- Fixed costs were based on prior year actuals with a plus of 2 work year equivalents to help support the anticipated heavy mission schedule
- Variable costs were based on engineering estimates to include currently scheduled missions
- Year 1 - [REDACTED]: Included in this estimate is a new internal communication system at an estimated cost [REDACTED]. The original system has begun to fail due to age, and replacement is deemed more financially effective than continuous repair.
- Year 2 - [REDACTED]: Included in this estimate is the P-3C Conversion at an estimated cost of [REDACTED]. The original contract did not include the P-3C aircraft since it was not acquired until December 2009, subsequent to the contract start date. It is currently being determined if it can support Operation Ice Bridge in FY14, and therefore modifications and engineering work must be started in FY 12 and 13 to accommodate the scientific and technical requirements for the Ice Bridge mission. The estimate also includes the NASA8 (B200) Engine #2 Overhaul at an estimated cost of [REDACTED]. The increase in flight hours results in the need for an engine overhaul sooner than originally anticipated.

- Year 3 - [REDACTED] Included in this estimate is the University of North Dakota (UND) Data System at an estimated cost of [REDACTED]. The UND Data System is a standardized data system used on various NASA Airborne Science aircraft to support experimenter data system needs. This system was mandated by NASA HQ to be installed on the P-3B aircraft after the original contract was awarded. Thus this system was not included in the original cost estimate. The system will be upgraded on the aircraft in FY12 to include new hardware and a new permanent mounting location in the aircraft. The estimate also includes the P-3C Conversion at an estimated cost of [REDACTED] (same explanation as in previous bullet), and the NASA8 (B200) Engine #1 Overhaul at an estimated cost of [REDACTED] (same explanation as in previous bullet).

4. Identify the regulatory authority justifying restriction.

The authority for justifying restriction to this source is found in FAR 8.405-6(a) (1) (i) (B); only one source.

5. A determination by the contracting officer that the order represents the best value consistent with FAR 8.404(d).

Services offered under the FSS are priced at fixed hourly rates or at a fixed price for performance of a specific task (such as installation, maintenance or repair). GSA has predetermined the prices and rates of the schedule contracts to be fair and reasonable. Additionally, to ensure the best value, the Government will request additional discounts from the Contractor in accordance with FAR 8.405-4 prior to award of the ceiling increase as was done on rates included in this current BPA. These combined efforts will result in the ensuring the Government receives the best value.

6. Describe the market research conducted (see FAR Part 10) among schedule holders and the results, or state why market research was not conducted.

A Request for Information was issued to the 24 contractors listed under the FSS Master Contract 66 schedule on February 18, 2011, seeking a capability statement and interest in being included on a source selection list for a potential competitive solicitation. After the request for information resulted in one response from the incumbent only, follow up via email and phone revealed that several contractors did not meet the requirements listed. These GSA schedule vendors mainly stated the same reason for not responding was that their company supplied parts or maintenance only for a particular aircraft. Of the 24 contractors listed on the schedule, Airtec Incorporated was the only company possessing the ability to provide all the services required.

Since only one company responded from the GSA schedule, a decision was made to post the advertisement mainstream via Federal Business Opportunities (FedBizOpps) to solicit open market responses. As a result, a second request for information for open market responses was posted on April 14, 2011 with an April 29, 2011 due date. This request resulted in a response from the incumbent only as well. Based on the results of the 2 request for information, it appears that only Airtec Inc. can supply all of the required labor

categories, specifically the airframe and power plant mechanics category, which is vital to this effort. Airtec has a unique advantage in providing these customized services to the NASA GSFC's WFF Aircraft Office for the past 5 years. Therefore, the conclusion of this market research resulted in a decision to increase the contract ceiling with the incumbent and to discuss strategy for the forthcoming follow-on contract prior to the conclusion of the performance period in 2014.

7. State the actions, if any, the Agency may take to remove or overcome any barriers to schedule competition before any subsequent acquisition for the supplies or services are required.

There are no actions in place to overcome barriers to competition in subsequent acquisitions as every effort has been made to include all schedule holders under the FSS in addition to utilizing FedBizOpps to access the public market. In both instances, the incumbent was the only contractor who responded and offered the services required. Any subsequent acquisition for those services would be given the same level of schedule analysis as the schedule holders, products and services provided can change over time. In the interest of fair opportunity a RFI would also be sent to all schedule holders at the time of need for any subsequent acquisitions.